

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSE MARIA DeCASTRO, a/k/a
CHILLE DeCASTRO, a/k/a DELETE
LAWZ,
Plaintiff,

v.

JOSHUA ABRAMS, a/k/a
ACCOUNTABILITY FOR ALL, KATE
PETER, a/k/a MASSHOLE TROLL
MAFIA,
Defendants.

C.A. No. 1:22-cv-11421-ADB

**JOSHUA ABRAMS' MOTION TO DISMISS THE FIRST AMENDED COMPLAINT
AND SUPPLEMENTAL COMPLAINT**

NOW COMES defendant Joshua Abrams a/k/a Accountability for All ("Abrams") who respectfully moves that the Court dismiss the First Amended Complaint and Supplemental Complaint filed by plaintiff Jose Maria DeCastro a/k/a Chille DeCastro, a/k/a Delete Lawz for failure to state a claim for which relief can be granted. *See* FED. R. CIV. P. 12(b)(6). Abrams requests that the Court dismiss not only the sole count against Abrams in the First Amended and Supplemental Complaints, but also that the Court reject any further request for leave to amend the complaint, and that such previously pled causes of action (i.e., defamation and intentional infliction of emotional distress) be dismissed, with prejudice, as well.

Abrams submits herewith a Memorandum of Law in support of this motion and incorporates said Memorandum as if fully stated herein.

Respectfully Submitted,

/s/ Joshua N. Garick, Esq.

Joshua N. Garick (BBO #674603)
LAW OFFICES OF JOSHUA N. GARICK, P.C.
34 Salem Street, Suite 202
Reading, Massachusetts 01867
Phone: (617) 600-7520
Fax: (617) 600-7430
Joshua@GarickLaw.com

*Counsel for Joshua Abrams a/k/a
Accountability for All*

Dated: December 23, 2022

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Joshua N. Garick

Joshua N. Garick (BBO #674603)

Dated: December 23, 2022